UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:25-cv-23097-JB

STAINTON WILLIAMS, By and Through His Designated Attorney-In-Fact, Blossome McLaughlin-Allen, Pursuant to a Valid and Enforceable Power of Attorney,

Plaintiff,

vs.

CITIZENS PROPERTY INSURANCE CORPORATION,

Defendant.	
	/

DEFENDANT'S NOTICE OF AVAILABILITY FOR STATUS CONFERENCE

Defendant, Citizens Property Insurance Corporation ("Defendant" or "Citizens"), by and through its undersigned attorneys and pursuant to this Court's Paperless Order dated July 29, 2025 (D.E. 8), hereby responds as follows:

- 1. The undersigned filed their appearances on behalf of Defendant on August 12, 2025 (D.E. 11).
- 2. Pursuant to this Court's Paperless Order dated July 29, 2025 (D.E. 8), the parties are required to "submit three proposed dates for a status conference no later than three days after Defendant enters an appearance in this matter." Accordingly, the deadline to comply with the July 29th Order is August 15, 2025.
- 3. Defendant's counsel has attempted to confer on several occasions with Plaintiff's counsel regarding proposed dates for a status conference to no avail.

- 4. As of the filing of this notice, Plaintiff's counsel has not: (i) attempted to contact the undersigned for purposes of clearing proposed dates for a status conference; (ii) provided proposed dates for a status conference; or (iii) responded to the undersigned's email communications on this same issue.
- 5. As such, Defendant is compelled to file its unilateral notice of availability for a status conference. Specifically, Defendant's counsel propose any of the following three dates for a status conference: **August 21, 25, or 26, 2025.**

Respectfully submitted,

SHUTTS & BOWEN LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of August 2025, a true and correct copy of the foregoing has been furnished *via* CM/ECF to: Michael Citron Esq., MAC Legal, P.A., 4601 Sheridan Street, Suite 205, Hollywood, Florida 33021 (michael@maclegalpa.com, service@maclegalpa.com).

/s/ David Batista
DAVID O. BATISTA